

LSKAD #: 374-6178 / 1896724
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of

RAMY LAKAH and MICHEL LAKAH

Petitioners,

-vs-
-vs-

Docket No.:

07-CV-2799 (MGC) (FM)

**DECLARATION OF
RAMY LAKAH**

For a judgment pursuant to Article 75 of The
C.P.L.R. staying arbitration commenced by

LIOS AG, EXPORTERS INSURANCE
COMPANY, LTD., ALAIS BANKING
CORPORATION, NATIONAL BANK OF ABU
DUBAI and NATIONAL BANK OF OMAN,

Respondents.

Ramy Lakah declares:

- 1 I am one of the petitioners in the above action.
- 2 I submit this declaration to explain why I am unable to personally
appear before Judge Cederbaum on February 25 as directed at the last conference.
- 3 I know that the law firm that has represented me for four years,
Lester Schwab Katz & Dwyer LLP, wishes to withdraw from representing me.
- 4 I previously told my lawyer, Lawrence Noadman, that I would
become current when I returned to Egypt and I fully intended to do so and I paid part
of what was owed.
- 5 Unfortunately I have been unable to do make full payment because
the Mubarak regime without warning se-froze my assets shortly after I re-entered the
country.

5 First, I am aware there is a visa waiver program. However, I cannot benefit from it. In 2005, because the Mubarak regime falsely made accusations against me and my companies for back taxes, an Interpol warrant was issued for me and I was forced to leave the United States, when I entered O'Hare Airport in Chicago.

7 When I last entered the United States for purposes of this litigation, I did so by visa because I was told that this was required of me. I attach a copy of the visa that I used. Ex. A.

8 Second, the current Egyptian government has prepared a list of businessmen and politicians who may not leave Egypt for a period of six months. I am on that list. I have asked my Egyptian contact, Gamal Halim, to provide a declaration regarding this development in Egypt. It is completely beyond my control. I am legally incapable of leaving to appear in New York, through no fault of my own.

9 Third, for the past three weeks, Egyptian banks and our stock market have been closed. When they opened two days ago, the banks imposed restrictions on the amount of money that can be withdrawn, depending on the amount in each branch. For example, today, February 22, I went to my bank and was permitted to take out only US\$500. It is impossible for me to pay new lawyers.

10 I have already contacted several lawyers in the United States to take over the handling of my case but I cannot retain them because I cannot pay a retainer. I do not want to try to handle a case of this magnitude without competent counsel.

11 From the beginning, I have maintained that URS has a vendetta against me. As explained in Mr. Halim's Declaration, the Egyptian Public Prosecutor

has now opened a criminal case against UBS in Egypt for corruption and misuse of funds. This is the same Prosecutor General that dismissed all cases against me.

12. The Prosecutor is now investigating a conspiracy between UBS and the Mubarak regime against me. Through that conspiracy, they froze off hundreds of millions of dollars of my assets. The purpose was to destroy me as a political opponent of Mubarak. That conduct has and is preventing me from paying my lawyers who defended me.

13. Today the Prosecutor General has sent an order to our Minister of Foreign Affairs to ask them to freeze all Mubarak's assets everywhere in the world including his assets in UBS Bank.

14. Martial law has been declared in Egypt due to the riots and criminal conduct that followed the fall of Mubarak. It will exist, by order of the Egyptian army, for the next six months.

15. I am legally disabled from leaving Egypt and, for this reason, I ask for an extension of time in which to find a new lawyer and to appear before the court in New York.

I declare that the statements above are true under penalty of perjury under the laws of the United States.

Henry Laksh

February ___, 2011

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VISA



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